

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

POWER BUYING DEALERS USA, INC., a  
Delaware corporation; CR@ZY US, LLC, a  
North Carolina limited liability company; and  
POWER ENERGY CORPORATION, a  
Delaware corporation,

Plaintiffs,

v.

JUUL LABS, INC., a Delaware corporation;  
and HS WHOLESALE, LIMITED, an Illinois  
corporation,

Defendants.

Case No. 1:21-cv-3154

Judge Sharon J. Coleman

Magistrate Judge Jeffrey T. Gilbert

**MOTION TO WITHDRAW AS PLAINTIFFS' COUNSEL**

Pursuant to Local Rule 83.17, Jeffery M. Cross and D. Richard Self of the law firm of Freeborn & Peters LLP, move for leave of Court to withdraw as counsel for Plaintiffs Power Buying Dealers USA, Inc., Cr@zy Us, LLC, and Power Energy Corporation.

Unfortunately, the irreconcilable differences between counsel and Plaintiffs have not been able to be resolved.

Defendants will not be harmed by this withdrawal as discovery is still in the early stages. The parties are just now completing document production and no depositions have been scheduled.

The principals of the Plaintiffs have been informed of this Motion and the form Notification of Party Contact Information is electronically filed as an attachment to this Motion to Withdraw.

May 17, 2022

Respectfully submitted,

By: /s/ Jeffery M. Cross

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Inc.; Cr@zy US, LLC; and Power Energy  
Corporation*

**CERTIFICATE OF SERVICE**

The undersigned counsel of record hereby certifies that on May 17, 2022, 2022, he caused a true and correct copy of the foregoing Motion To Withdraw As Plaintiffs' Counsel to be electronically filed with the United States District Court, Northern District of Illinois, Eastern Division, utilizing the Court's electronic court filing system (ECF), which served notification of such filing to all counsel of record. The undersigned also certifies that he informed by email the principals of each Plaintiff of the fact and substance of this Motion, attaching a copy of the email.

By: /s/ Jeffery M. Cross

*Attorney for Plaintiffs Power Buying Dealers  
USA, Inc.; Cr@zy Us, LLC; and Power Energy  
Corporation*